

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
EDWARD SHIN,

17-cv-05183

Plaintiff,

-against-

**VERIFIED ANSWER TO
FIRST AMENDED COMPLAINT
CROSS CLAIM & DEMANDS**

YS2 ENTREPRISES INC., MICHAEL S. WANG,
RICHARDSON IRREVOCABLE TRUST, TERRANCE
WU, DEH-JUNG DEBORAH WANG, And
YOUNG K. LEE,

Defendants.
-----X

The defendant **YOUNG K. LEE**, by his attorneys, **LONGO & D'APICE, ESQS.**, answering the First Amended Complaint of the plaintiff herein, alleges:

I. ANSWERING THE PARTIES:

1. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs numbered and designated "1", "2", "4", "5", "6", "7", "8", "9", "10", "11", "12", "13" and "14" of the plaintiff's First Amended Complaint.

2. Denies each and every allegation contained in paragraph numbered and designated "3" of the plaintiff's First Amended Complaint.

II. ANSWERING JURISDICTION AND VENUE:

3. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs numbered and designated "16" and "17" of the plaintiff's First Amended Complaint.

4. Denies each and every allegation contained in paragraph numbered and designated "15" of the plaintiff's First Amended Complaint.

III. ANSWERING FACTUAL ALLEGATIONS:

5. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs numbered and designated "18", "19", "20", "21", "28", "29", "30", "31", "33" and "34" of the plaintiff's First Amended Complaint.

6. Denies each and every allegation contained in paragraphs numbered and designated "22", "23", "24", "25", "26", "27", "32", "35", "36", "37", "38", "39", "40" and "41" of the plaintiff's First Amended Complaint.

IV. ANSWERING FIRST COUNT:

Statutory Claim vs. YS2

7. Denies each and every allegation contained in paragraph of the First Amended Complaint numbered and designated "42", except as otherwise pleaded herein.

8. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs numbered and designated "44" and "45" of the plaintiff's First Amended Complaint.

9. Denies each and every allegation contained in paragraph numbered and designated "43" of the plaintiff's First Amended Complaint.

V. ANSWERING SECOND COUNT:

Negligence vs. YS2

10. Denies each and every allegation contained in paragraph of the First Amended Complaint numbered and designated "46", except as otherwise pleaded herein.

11. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs numbered and designated "47" and "48" of the plaintiff's First Amended Complaint.

12. Denies each and every allegation contained in paragraph numbered and designated "49" of the plaintiff's First Amended Complaint.

VI. ANSWERING THIRD COUNT:

NEGLIGENCE vs. OWNER DEFENDANTS

13. Denies each and every allegation contained in paragraph of the First Amended Complaint numbered and designated "50", except as otherwise pleaded herein.

14. Denies any knowledge or information sufficient to form a belief as to each and every allegation contained in paragraphs numbered and designated "51", "52" and "53" of the plaintiff's First Amended Complaint.

VI. ANSWERING FOURTH COUNT:

NEGLIGENCE/GROSS NEGLIGENCE vs. LEE

15. Denies each and every allegation contained in paragraph of the First Amended Complaint numbered and designated "54", except as otherwise pleaded herein.

16. Denies each and every allegation contained in paragraphs numbered and designated "55", "56" and "57" of the plaintiff's First Amended Complaint.

VI. ANSWERING FIFTH COUNT:
BATTERY vs. LEE

17. Denies each and every allegation contained in paragraph of the First Amended Complaint numbered and designated "58", except as otherwise pleaded herein.

18. Denies each and every allegation contained in paragraphs numbered and designated "59", "60", "61" and "62" of the plaintiff's First Amended Complaint.

**AS AND FOR A FIRST SEPARATE AND COMPLETE
AFFIRMATIVE DEFENSE THE ANSWERING DEFENDANT
SHOWS TO THIS COURT AND ALLEGES:**

19. That the injuries and damages allegedly sustained by the plaintiffs were caused by the failure and refusal of the plaintiff to exercise adequate care and caution in the premises, and by their assumption of all risks involved therein, plaintiff knew or should have known each and every risk involved therein and with the aforesaid knowledge engaged in the activities which subsequently led to his injuries.

**AS AND FOR A SECOND SEPARATE AND COMPLETE
AFFIRMATIVE DEFENSE THE ANSWERING DEFENDANT
SHOWS TO THIS COURT AND ALLEGES:**

20. That any injury or injuries sustained by the plaintiffs herein were not caused by any negligence or carelessness on the part of the answering defendant, but were caused solely by the negligence and carelessness on the part of

the plaintiff, and that said negligence and carelessness on the part of the plaintiff contributed to and caused the injuries complained of.

**AS AND FOR A THIRD SEPARATE AND COMPLETE
AFFIRMATIVE DEFENSE THE ANSWERING DEFENDANT
SHOWS TO THIS COURT AND ALLEGES:**

21. That in the event the Defendant herein is held liable, such liability shall be limited in accord with the provisions of C.P.L.R. Sec. 1601, et seq.

**AS AND FOR A FOURTH SEPARATE AND COMPLETE
AFFIRMATIVE DEFENSE THE ANSWERING DEFENDANT
SHOWS TO THIS COURT AND ALLEGES:**

22. Pursuant to C.P.L.R. §4545, plaintiff's recovery should be reduced by any amounts received or to be received by plaintiff from collateral sources of payment.

SEE ANNEXED - CROSS CLAIMS

AS AND FOR A CROSS-CLAIM AGAINST THE CO-DEFENDANTS,
**YS2 ENTREPRISES INC., MICHAEL S. WANG, RICHARDSON
IRREVOCABLE TRUST, TERRANCE WU and DEH-JUNG
DEBORAH WANG,**

THIS ANSWERING DEFENDANT ALLEGES:

THAT if the answering defendant is adjudged liable to plaintiff herein by reason of the ownership of the vehicle involved or otherwise, upon the facts or by operation of law, then such liability will have come about either wholly and solely by reason of the negligence of the co-defendants above named, or the greater responsibility for the injuries and damages sustained by the plaintiffs will be that of the co-defendants above named, and that by reason of the foregoing, the answering defendant demands that the Court, on the trial hereof, either grant judgment over in favor of the answering defendant and against the co-defendants for the amount of any judgment rendered herein, or to apportion the responsibility in negligence, if any, between the parties;

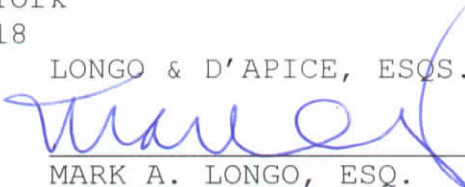
THAT in the event the answering defendant is held liable to the plaintiff herein, then the answering defendant demands judgment against the co-defendants for such amount as he, she or they may be required to pay the plaintiffs over and above his, her or their proportionate share as may be determined by the apportionment of responsibility as adjudged herein.

WHEREFORE, answering defendant demands judgment dismissing the First Amended Complaint herein and further demands that the Court apportion the responsibility, if any, between the defendants and further demands judgment over and against the co-defendants, above named, for the amount of any sums paid to plaintiff over and above his, her or their proportionate share of any judgment as determined by the apportionment of responsibility adjudged herein, together with costs and disbursements of this action.

Dated: Brooklyn, New York
November 8, 2018

LONGO & D'APICE, ESQS.

By:


MARK A. LONGO, ESQ.
LONGO & D'APICE, ESQS.
Attorneys for Defendant,
YOUNG K. LEE

26 Court Street - Suite 1700
Brooklyn, New York 11242
(718)855-5684
Our File No. A3028W

TO: SEE ANNEXED RIDER

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
EDWARD SHIN,

17-cv-05183

Plaintiff,

INTERROGATORIES

-against-

YS2 ENTREPRISES INC., MICHAEL S. WANG,
RICHARDSON IRREVOCABLE TRUST, TERRANCE
WU, DEH-JUNG DEBORAH WANG, And
YOUNG K. LEE,

Defendants.
-----x

S I R:

PLEASE TAKE NOTICE that you are hereby requested to serve and file the following particulars of plaintiff's alleged causes of action herein within twenty (20) days from the date of service hereof:

1) The date and exact time of day of the occurrence.

2) State the location of the incident in sufficient detail to permit identification, giving the precise location where the incident allegedly occurred.

3) Set forth the specific acts or omissions on the part of the defendant which constituted the claimed negligence.

4) Set forth the specific acts or actions on the part of the plaintiff immediately prior to the alleged incident herein.

5) Set forth the specific acts or actions on the part of the defendant immediately prior to the alleged incident herein.

6) Set forth the specific actions on the part of the plaintiff which caused the defendant to allegedly offensively and intentionally cause bodily contact with the said plaintiff.

7) Set forth the age of the plaintiff at the time of the alleged incident.

8) Set forth the names and addresses of any and all persons present at the time of the occurrence.

9) State the exact time and place if and when a complaint was first made to the Police or Police agency.

10) State whether there were any eyewitnesses to the alleged incident known to the Police Department or any police agency, or the plaintiff. If so, set forth the name(s); address(es) of the said person(s).

11) Provide the defendant with the substance of all oral statements made by any and all witnesses, including the plaintiff, **EDWARD SHIN**, and copies of all statement(s) made by any and all witness(es), including the plaintiff, if reduced to writing (whether signed or unsigned) or if otherwise recorded, provide copies thereof.

12) State whether the defendant is alleged to have made oral or written statements. If so, state whether the alleged statement was made to a Police Officer or any other person.

13) State the name(s), address(es) of the person(s) to whom such statement was made; state the exact time and date and place where the alleged statement was made; state the name(s), address(es) and birth date(s) of any and all persons present when the alleged statement was made.

14) Set forth the nature, extent, location and duration of each and every injury alleged to have been sustained by the plaintiff, and which, if any, are claimed to be permanent in nature.

15) Set forth the length of time, giving specific dates, the plaintiff was confined to (a) the hospital; (b) to bed and home as a result of the alleged injuries.

16) The length of time incapacitated from employment as a result of the alleged injuries, with the name and address of plaintiff's employer at the time of the alleged incident, and the amount of time lost therefrom.

17) If plaintiff is not employed, specifically state the amount of time lost from his usual occupation.

18) Separately state each amount claimed as special damages for said plaintiff as a result of the alleged incident, for:

- (a) Physician's services;
- (b) Medical supplies;
- (c) Nurses' services;
- (d) Loss of earnings;
- (e) Hospital expenses, with name and address of hospital;
- (f) X-ray expenses;
- (g) Miscellaneous expenses;
- (h) Name and address of Plaintiff's employer at the time of the occurrence, the position held by Plaintiff and rate of earnings; or, if self-employed, the name and address under which Plaintiff is doing business. If Plaintiff is a student, the name and address of the school attended at the time of the occurrence.

19) Set forth the specific acts or omissions on the part of the defendant which constitute the claimed intentional actions, specifying which, if any, actions were willful and/or intentional and which were without provocation.

20) In what respect is it claimed plaintiff has sustained a serious injury, as defined in Sub-division of Section 671 of the Insurance Law, or economic loss greater than basic economic loss, as defined in Sub-division 1 of Section 671 of the Insurance Law.

21) State whether actual or constructive notice is claimed.

(a) If actual notice is claimed, state the time, place and the name of the person to whom such notice was given.

(b) If constructive notice is claimed, state how long the condition existed.

22) The sections of statutes, ordinances, rules and regulations claimed to have been violated by Defendant.

23) Set forth in precise detail the specific facts which led to the incident complained of herein.

24) Set forth with specificity, the reason(s) the attack upon the plaintiff allegedly occurred.

25) Set forth with specificity what caused the alleged attack.

PLEASE TAKE FURTHER NOTICE, that in the event of the plaintiffs' failure to comply with the foregoing demand within twenty (20) days, the answering defendant will move to preclude plaintiffs from offering any evidence as to any allegations of the Complaint of which particulars were demanded.

Dated: Brooklyn, New York
November 8, 2018

LONGO & D'APICE, ESQS.



By: MARK A. LONGO, ESQ.
Attorneys for Defendant,

YOUNG K. LEE

26 Court Street - Suite 1700
Brooklyn, New York 11242
(718) 855-5684
Our File No. A3028W

TO: SEE ANNEXED RIDER

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
EDWARD SHIN,

17-cv-05183

Plaintiff,

-against-

**DEMAND FOR COPIES OF
PLAINTIFF'S MEDICAL &
HOSPITAL RECORDS AND
BILLS**

YS2 ENTREPRISES INC., MICHAEL S. WANG,
RICHARDSON IRREVOCABLE TRUST, TERRANCE
WU, DEH-JNG DEBORAH WANG and
YOUNG K. LEE,

Defendants.

-----x
S I R:

PLEASE TAKE NOTICE, that pursuant to the Rules of the
Appellate Division, Second Department, demand is hereby made
upon the plaintiff or his attorneys to:

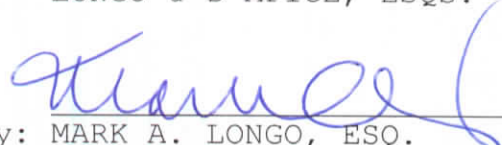
1. Serve upon and deliver to the attorneys for the defendant copies of the medical reports of those physicians who have previously treated or examined the plaintiff and who will testify on his behalf. These shall include a detailed recital of the injuries and conditions as to which testimony will be offered at the trial, referring to and identifying those x-rays and technician's reports which will be offered at the trial.
2. Serve upon and deliver to the attorneys for the defendant duly executed and acknowledged written authorizations permitting all parties to obtain and make copies of all hospital records and such other records including x-rays and technician's reports as to be referred to and identified in the statement of the plaintiff's physicians.
3. Serve upon and deliver to the attorneys for the defendant duly executed and acknowledged written authorizations permitting all parties to obtain and make copies of the No-Fault file.

PLEASE TAKE FURTHER NOTICE, that upon your failure to
comply with this Demand, the plaintiff will be precluded upon

the trial of the within action from offering in evidence or
testifying as to any of the reports, records or examinations
demanded herein.

Dated: Brooklyn, New York
November 8, 2018

LONGO & D'APICE, ESQS.



By: MARK A. LONGO, ESQ.
Attorneys for Defendant,
YOUNG K. LEE

26 Court Street - Suite 1700
Brooklyn, New York 11242
(718) 855-5684
Our File No. A3028W

TO: SEE ANNEXED RIDER

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
EDWARD SHIN,

17-cv-05183

Plaintiff,

**DEMAND FOR COLLATERAL
SOURCE INFORMATION**

-against-

YS2 ENTREPRISES INC., MICHAEL S. WANG,
RICHARDSON IRREVOCABLE TRUST, TERRANCE
WU, DEH-JNG DEBORAH WANG and
YOUNG K. LEE,

Defendants.

-----x
S I R S:

PLEASE TAKE NOTICE, that if the plaintiff is claiming damages for the recovery of costs for medical care, dental care, custodial care, rehabilitation services, loss of earnings or other economical loss, then:

PLEASE TAKE NOTICE, that demand is hereby made pursuant to Section 4545(c) of the C.P.L.R. for records, notices, invoices, cancelled checks, insurance contracts, statements, premium invoices, bills, union benefit contracts, statements of accounts, correspondence, notations and memoranda, by whatever name known, that would reflect the following:

1. The amount paid to or on behalf of the plaintiff by insurance, social security, worker's compensation, employee benefits programs, medical care programs or other collateral sources replacing or indemnifying plaintiff for the costs claimed to be items of damage;
2. The amounts paid by the plaintiff, if any, to the collateral source provider (or others) for the period of two (2) years prior to the date of the incident complained of in plaintiffs' Complaint;
3. The amounts paid or reasonably anticipated to be paid, if any, by the plaintiff to the collateral source provider (or others) for the period beginning on the date of the incident complained of in the Complaint, to the time when such damage costs were no longer paid.

PLEASE TAKE FURTHER NOTICE, that upon your failure to produce the aforesaid information and/or documents within thirty (30) days, a motion may be made and costs may be requested.

PLEASE TAKE FURTHER NOTICE, that the foregoing is a continuing demand. In the event any of the above are obtained after this demand, they are to be furnished to the undersigned within thirty (30) days of receipt.

Dated: Brooklyn, New York
November 8, 2018

LONGO & D'APICE, ESQS.



By: MARK A. LONGO, ESQ.
Attorneys for Defendant,
YOUNG K. LEE
26 Court Street - Suite 1700
Brooklyn, New York 11242
(718) 855-5684
Our File No. A3028W

TO: SEE ANNEXED RIDER

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
EDWARD SHIN,

17-cv-05183

Plaintiff,

-against-

**DEMAND FOR
DISCLOSURE AS TO
MEDICARE/MEDICAID LIEN**

YS2 ENTREPRISES INC., MICHAEL S. WANG,
RICHARDSON IRREVOCABLE TRUST, TERRANCE
WU, DEH-JNG DEBORAH WANG and
YOUNG K. LEE,

Defendants.
-----x

S I R S:

PLEASE TAKE NOTICE, that pursuant to Article 31 of
the Civil Practice Law and Rules, the undersigned attorney for
the defendant hereby demands that you furnish us within thirty
(30) days of the service of this Notice, the following:

1. A statement as to whether the plaintiff has received benefits from either Medicare or Medicaid at any time, for any reason, not limited to the injuries alleged in the instant action. If so, please state:
 - a. Plaintiff's date of birth;
 - b. Plaintiff's Social Security Number;
 - c. Plaintiff's resident telephone number;
 - d. The Medicare/Medicaid file number;
 - e. The address of the office handling the plaintiff's Medicare/Medicaid file;
 - f. Copies of all documents, records, memorandums, notes, etc. in plaintiff's possession pertaining to plaintiff's receipt of Medicare or Medicaid benefits, and
 - g. A duly executed authorization bearing plaintiff's date of birth and Social and/or representative of defendant to obtain copies of plaintiff's Medicare or Medicaid records.

PLEASE TAKE FURTHER NOTICE, that pursuant to C.P.L.R., this is a continuing demand and that you are required to serve the demanded information by the earliest of the following:

- a. Within 30 days of the date of this demand;
- b. Within 20 days of receiving the above-requested information;
- c. No later than 30 days prior to the commencement of trial.


If you do not possess the above requested information, a letter or affidavit to that effect should be submitted.

PLEASE TAKE FURTHER NOTICE, that failure to provide the items demanded above within twenty (20) days will preclude plaintiff from proving liability, causation and damages at trial.

Dated: Brooklyn, New York
November 8, 2018

LONGO & D'APICE, ESQS.

By:


MARK A. LONGO, ESQ.
Attorneys for Defendant,
YOUNG K. LEE
26 Court Street - Suite 1700
Brooklyn, New York 11242
(718) 855-5684
Our File No. A3028W

TO: SEE ANNEXED RIDER

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
EDWARD SHIN,

17-cv-05183

Plaintiff,

**NOTICE OF DISCOVERY
AND INSPECTION**

-against-

YS2 ENTREPRISES INC., MICHAEL S. WANG,
RICHARDSON IRREVOCABLE TRUST, TERRANCE
WU, DEH-JNG DEBORAH WANG and
YOUNG K. LEE,

Defendants.

-----X
S I R:

PLEASE TAKE NOTICE that the defendants and/or plaintiff herein, pursuant to Sec. 3101 et seq., and Section of the C.P.L.R. 3120, are required to produce and allow discovery, inspection and copying by the undersigned attorneys, of the following items, writings and objects, maintained, controlled and/or supervised by the defendants and/or plaintiff, or their agents, servants and/or employees.

IN LIEU of strict compliance with the terms and conditions of this Notice, the undersigned will accept clearly legible photocopies of the said items if received by the undersigned at least five (5) days prior to the return date hereof, together with a letter from the attorneys for defendants and/or plaintiffs advising as to the completeness of the items provided.

PLACE OF DISCOVERY: At the offices of LONGO & D'APICE, ESQS.
26 Court Street-Suite 1700
Brooklyn, New York 11242

DATE & TIME: 3rd day of December, 2018 at 2:00 P.M.

ITEMS TO BE PRODUCED TO THE WITHIN ACCIDENT:

- 1) All contracts of insurance coverage in effect at the time of the accident and/or incident which occurred on the date of the occurrence herein that would afford primary coverage or excess insurance coverage for the owner and/or driver and/or lessee of the defendants and/or plaintiffs vehicle; premises; property; land.

- 2) All family policies of liability insurance which would afford primary coverage to the defendants and/or plaintiffs owner and/or operator and/or lessee of the defendants and/or premises, property; land.
- 3) Any other insurance contract which would afford primary or excess coverage, including any "umbrella" policy for vehicle; premises; property; land.
- 4) Any and all statements, abstracts of records and/or writing taken by the defendants and/or plaintiff individually or by the defendants and/or plaintiff's attorneys, and/or agents from the plaintiff and/or defendants with reference to the within litigation which are presently in the possession of the defendants and/or plaintiff, agents or attorneys pursuant to C.P.L.R. 3101(c), and which will be used on the trial herein.
- 5) Set forth the name and address of each person plaintiff will or expects to call as an expert witness at trial and disclose in reasonable detail the subject matter on which each expert is expected to testify, the qualifications of each expert witness and a summary of the grounds for each expert's opinion.
- 6) All photographs under the control of defendants and/or plaintiffs or their attorneys or representatives showing the condition of the scene alleged to represent the incident scene as of the time of said incident, and which is intended to be introduced at the trial for that purpose.
- 7) A copy of the incident report filled out by the defendants and/or plaintiff, their agents and/or employees, following the happening of the incident herein, and taken in normal course of business and prior to litigation.

- 8) The names and addresses of any witnesses to the within incident obtained by the defendants and/or plaintiff, their agents, and/or employees. Zellman vs. Metropolitan Transportation, 40 A.D. 2d 298; Zayes vs. Morales, 45 A.D. (2d) 610.
- 9) Copies of statements from any witnesses or participants to the within incident which is the subject of this litigation. Koump vs. Smith, 25 N.Y. (2d) 287.
- 10) Original duly executed authorizations to obtain No-Fault Records, employment records, medical and/or hospital records and school authorizations, if applicable.
- 11) DEMAND is hereby made upon you that you serve upon the undersigned attorneys, a list of the names of all the parties who have appeared in this action, together with the names and addresses of their respective attorneys, pursuant to Section 2103 (3) of the C.P.L.R.

PLEASE TAKE FURTHER NOTICE that all the foregoing discovery information is to be furnished prior to the trial of this action.

Dated: Brooklyn, New York
November 8, 2018

LONGO & D'APICE, ESQS.



By: MARK A. LONGO, ESQ.
Attorneys for Defendant,
YOUNG K. LEE
26 Court Street - Suite 1700
Brooklyn, New York 11242
(718) 855-5684
Our File No. A3028W

TO: SEE ANNEXED RIDER

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
EDWARD SHIN,

Plaintiff,

17-cv-05183

-against-

**NOTICE TO TAKE
DEPOSITION UPON
ORAL EXAMINATION**

YS2 ENTREPRISES INC., MICHAEL S. WANG,
RICHARDSON IRREVOCABLE TRUST, TERRANCE
WU, DEH-JNG DEBORAH WANG and
YOUNG K. LEE,

Defendants.
-----x

C O U N S E L:

PLEASE TAKE NOTICE, that pursuant to Rule 30, et seq., F.R.C.P., the testimony upon oral examination of the persons named shall be taken before a Notary Public, as follows:

PARTIES TO BE EXAMINED:

The Plaintiff, **EDWARD SHIN** and co-defendants **YS2 ENTREPRISES INC., MICHAEL S. WANG, RICHARDSON IRREVOCABLE TRUST, TERRANCE WU, DEH-JUNG DEBORAH WANG**, or their representatives.

DATE AND TIME:

At a date, time and place to be fixed by the Magistrate at a Status Conference to be held herein.

PLACE:

U.S. DISTRICT COURT,
EASTERN DISTRICT OF NEW YORK at
Cadman Plaza, Brooklyn, New York.

Dated: Brooklyn, New York
November 8, 2018

LONGO & D'APICE, ESQS.



By: **MARK A. LONGO, ESQ.**
Attorneys for Defendant,
YOUNG K. LEE

26 Court Street - Suite 1700
Brooklyn, New York 11242
(718) 855-5684

TO: SEE ANNEXED RIDER

Our File No. A3028W

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
SHANTI CHADHA,

18-cv-00316

Plaintiff,

**DEFFENDANTS' DISCLOSURE
OF INTERESTED PARTIES**

-against -

YS2 ENTREPRISES INC., MICHAEL S. WANG,
RICHARDSON IRREVOCABLE TRUST, TERRANCE
WU, DEH-JNG DEBORAH WANG and
YOUNG K. LEE,


Defendants.
-----X

I, **MARK A. LONGO, ESQ.**, attorney for defendant **YOUNG K. LEE**
having filed an initial pleading in the Court pursuant to Local
General Rule 9 of the Local Rules for the Southern and Eastern
Districts of New York:

THAT the Defendant, **YOUNG K. LEE** is insured by Allstate
Insurance Company.

Dated: Brooklyn, New York
November 8, 2018

LONGO & D'APICE, ESQS.


By: **MARK A. LONGO, ESQ.**
Attorneys for Defendant,
YOUNG K. LEE
26 Court Street - Suite 1700
Brooklyn, New York 11242
(718) 855-5684
Our File No. A2940W

TO: SEE ANNEXED RIDER

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----x
EDWARD SHIN,

17-cv-05183

Plaintiff,

**DEFENDANTS' RESPONSE
TO RULE 26 DISCLOSURE**

-against-

YS2 ENTREPRISES INC., MICHAEL S. WANG,
RICHARDSON IRREVOCABLE TRUST, TERRANCE
WU, DEH-JNG DEBORAH WANG and
YOUNG K. LEE,

Defendants.

-----x
S I R:

The defendant **YOUNG K. LEE** by his attorneys LONGO &
D'APICE, ESQS., respectfully responds to the mandatory
disclosure requirements pursuant to F.R.P.C. Rule 26,
in connection with the above captioned as follows:

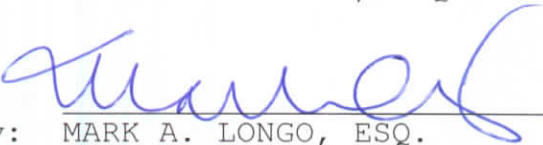
1. The defendant will provide liability insurance coverage(s) at a later date.
2. The defendant are presently unaware of any witnesses to the within subject occurrence other than the parties herein.
3. The defendant does not presently possess any adverse party statements.
4. The defendant does not presently possess any pictures, videotapes, photographs taken of (a) the scene of the incident; (b) the plaintiff; or (c) the instrumentalities involved in said incident.
5. The defendant has not retained an expert witness at the present time, but reserves the right to appoint an expert

witness in the future.

PLEASE TAKE NOTICE, that the defendant reserves the right to supplement any part of this response if pertinent information becomes available at a later date.

Dated: Brooklyn, New York
November 8, 2018

LONGO & D'APICE, ESQS.


By: MARK A. LONGO, ESQ.
Attorneys for Defendant,
YOUNG K. LEE
26 Court Street - Suite 1700
Brooklyn, New York 11242
(718) 855-5684
Our File No. A3028W

TO: SEE ANNEXED RIDER

V E R I F I C A T I O N:

AFFIDAVIT OF SERVICE BY MAIL

STATE OF NEW YORK, COUNTY OF KINGS SS:

I, the undersigned, an attorney admitted to practice in the Courts of New York State, state that I am **MARK A. LONGO, ESQ.**, the attorney of record for defendant **YOUNG K. LEE** in the within action; I have read the foregoing **VERIFIED ANSWER TO FIRST AMENDED COMPLAINT, AFFIRMATIVE DEFENSES CROSS CLAIMS AND DEMANDS**, and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe it to be true. The reason this verification is made by me and not by defendants - do not reside in County wherein deponent's office is maintained.

The grounds of my belief as to all matters not stated upon my own knowledge are as follows:

A review of the file(s) maintained in this office.

I affirm that the foregoing statements are true, under the penalties of perjury.

Dated: Brooklyn, New York
November 8, 2018



MARK A. LONGO

R I D E R:

The Basil Law Group, P.C.
Attorneys for Plaintiff
1270 Broadway, Suite 305
New York, New York 10001
(917)512-3066

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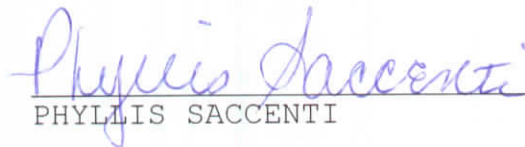
AFFIDAVIT OF SERVICE BY MAIL

STATE OF NEW YORK, COUNTY OF KINGS SS:

I, **PHYLLIS SACCENTI**, being sworn, say: I am not a party to the action, am over 18 years of age and reside at Brooklyn, New York, 11215.

On **November 8, 2018**, I served the within **VERIFIED ANSWER TO FIRST AMENDED COMPLAINT, AFFIRMATIVE DEFENSES CROSS CLAIMS AND DEMANDS**, by depositing a true copy thereof in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to each of the following persons at the last known address set forth after each name:

SEE ANNEXED RIDER


PHYLLIS SACCENTI

Sworn to before me on this
8th day of November, 2018.


NOTARY PUBLIC

MARK A. LONGO
Notary Public, State of New York
Qualified in Kings County
Commission Expires November 18, 2021

Index No. 17-cv-05183

Year

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

EDWARD SHIN,

Plaintiff,

-against-

YS2 ENTREPRISES INC., MICHAEL S. WANG, RICHARDSON IRREVOCABLE
TRUST, TERRANCE WU, DEH-JNG DEBORAH WANG and YOUNG K. LEE,

Defendants.

**VERIFIED ANSWER TO
FIRST AMENDED COMPLAINT
AFFIRMATIVE DEFENSES
CROSS CLAIMS & DEMANDS**

LAW OFFICES OF
LONGO & D'APICE, ESQS.
Attorneys for Defendant,
YOUNG K. LEE

Office and Post Office Address, Telephone
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BROOKLYN, NEW YORK 11242
(718) 855-5684
(718) 722-7300

To

Signature (Rule 130.1-a)

Attorney(s) for

.....
Print name beneath

Service of a copy of the within is hereby admitted.

Dated,

.....
Attorney(s) for